

REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 1-19 are pending in this application.

Premature Finality of the Office Action:

Applicant submits that the finality of the Office Action is premature. The Office Action introduced a new ground of rejection (formed by the combination of Suzuki and Bokhour) that was not necessitated by Applicant's amendments of the claims. While claim amendments were filed in Applicant's April 12, 2005 Amendment/Response, most of these amendments merely involve changing "means" to --mechanism--. None of these claim amendments necessitated the change of rejection from Suzuki (alone) to the new grounds of rejection formed by Suzuki and Bokhour. Applicant therefore respectfully requests that the finality of the Office Action be withdrawn.

Rejection Under 35 U.S.C. §103:

Claims 1-19 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Suzuki (U.S. '175) in view of Bokhour (U.S. '333). Applicant traverses this rejection.

In order to establish a *prima facie* case of obviousness, all of the claim limitations must be taught or suggested by the prior art. The combination of Suzuki and Bokhour fails to teach or suggest all of the claim limitations. For example, the combination fails to teach or suggest "detecting an outline portion of an image as an outline area, with respect to an area other than the ink line area and the neighboring area in the original image," as required by independent claim 1 and its dependents. Independent claims 6 and 11 and

their respective dependents require similar limitations. The combination also fails to teach or suggest “detecting an outline area of the original image, the outline area being outside of the ink line area and the neighboring area and having a brightness which differs from an area adjacent to the outline area,” as required by independent claim 12 and its dependents. Independent claim 16 and its dependents require similar limitations.

Suzuki discloses extracting an outline portion of an image. However, the outline extraction process is limited to particular detection ranges (A1-An in Fig. 5B; B1-Bm in Fig. 6; and B11-B1m in Fig. 8B). Suzuki fails to disclose an outline portion of an image being extracted with respect to an area other than the ink line area and the neighboring area in the original image. That is, Suzuki fails to disclose an outline extraction process being performed for the entire area of the original image except the ink line area and the neighboring area thereof. Bokhour fails to remedy these deficiencies of Suzuki.

Accordingly, even if Suzuki and Bokhour were combined as proposed by the Office Action, the combination would not have taught or suggested excluding an ink line area (i.e., a low brightness area) and its neighboring area from an area to which an outline extraction process is performed. Moreover, neither Suzuki nor Bokhour (alone or in combination) appreciates the benefit of preventing an ink line area from becoming thickened in a line image obtained from such an outline extraction process.

Moreover, the combination of Bokhour and Suzuki further fails to teach or suggest “detecting an area whose brightness is smaller than a predetermined value in an original image, as an ink line area,” as required by independent claim 1 and its dependents. Independent claims 6, 11, 12 and 16 require similar (but not necessarily identical) limitations. Page 3, lines 8-10 of the Office Action admits “Suzuki does not

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teach ink line area detecting means for detecting an area whose brightness is smaller than a predetermined value in an original image as an ink line area....” Applicant submits that Bokhour fails to remedy this admitted deficiency of Suzuki.

The bottom of page 3 of the Office Action specifically identifies col. 5, lines 40-55 of Bokhour. This portion of Bokhour discloses scanning the gray scale image 64 to generate a region map 68a. This scanning process to generate region map 68a includes “locating portions of the image where the intensity level of adjacent pixels changes by more than a predetermined amount.” The gray scale image may be repeatedly scanned with a first relatively high intensity threshold to generate a series of regions that outline the larger regions of similar intensity in the gray scale image, and then with successively lower intensity threshold(s), to generate more detailed regions within the previously generated regions. The number of scans performed is directly proportional to the amount of detail on the region map 68a.

While Bokhour appears to disclose identifying portions of an image where intensity level changes by a predetermined amount, Bokhour fails to disclose detecting an area whose brightness is smaller than a predetermined value in an original image as an ink line area (i.e., low brightness area). Again, the scanning process described in col. 5, lines 40-55 of Bokhour relates to a change of intensity level exceeding a predetermined amount.

Since the combination of Suzuki and Bokhour fails to disclose detecting an ink line area, Applicant submits that the combination also fails to teach or suggest a neighboring area of that ink line area. To the extent that the Office Action admits that an

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ink line area is not disclosed by Suzuki, Suzuki also necessarily fails to disclose a neighboring area of that ink line area.

Accordingly, Applicant respectfully submits that claims 1-19 are not "obvious" in view of Suzuki and Bokhour and respectfully requests that the rejection of these claims under 35 U.S.C. §103 be withdrawn.

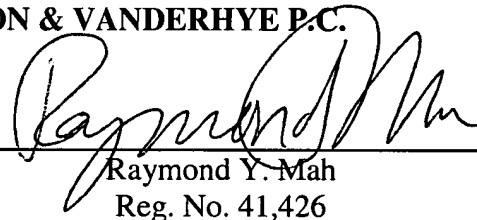
Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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By: _____


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